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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KAREN BARRETT

10 CV 04600 (AKH)(MHD)

Plaintiff,

-against-

AFFIRMATION OF
SCOTT M. RIEMER
IN OPPOSITION TO
MOTION TO STRIKE

HARTFORD LIFE AND ACCIDENT INSURANCE
COMPANY

Defendant.

-----X

SCOTT M. RIEMER, an attorney duly admitted to practice in the Courts of this State, does hereby affirm to be true under the penalties of perjury as follows:

1. I am counsel for plaintiff in the above-referenced action. I submit this affirmation in opposition to Hartford's motion to strike Exhibits "C" through "H" to the Affirmation of Scott M. Riemer dated May 17, 2011.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Exhibits to the Complaint (Bernstein Dec. dated 3/29/11, Ex. C) filed on June 14, 2010 in this case. The following pages in **Exhibit 1** are identical to Exhibits "F" and "H" to the Declaration of Scott M. Riemer dated May 17, 2011:

Document	Exhibit 1 (Exhibits to the Complaint)	Exhibits “F” and “H” to the Riemer Declaration
HAR 2994	32	2
HAR 2999	33	7
HAR 3244	39	11
HAR 1834-37	41-44	1-4

3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiff’s Request For Production of Documents dated September 13, 2010. Document Demand No. 20 states: “All documents that evidence, record, reflect or refer to the organizational structure maintained by Hartford from 2009 through 2010.”

5. Hartford failed to provide Exhibit “E”, an organizational chart dated January 27, 2009, in response to Document Demand No. 20 though it is clearly responsive to the request.

WHEREFORE, Hartford's motion should be denied in its entirety.

Dated: New York, New York
June 28, 2011

/s/Scott M. Riemer
SCOTT M. RIEMER (SR5005)
RIEMER & ASSOCIATES LLC
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(212) 297-0700
sriemer@riemerlawfirm.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 28, 2011, I served a true and complete copy of the foregoing Opposition to Motion to Strike Affirmation by transmitting the same by electronic mail to the following individuals at the e-mail addresses indicated:

Michael H. Bernstein
Sedgwick LLP
125 Broad Street, 39th Floor
New York, New York 10004-2400
Tel.: (212) 422-0202
Fax: (212) 422-0925

I also certify that this document filed through the ECF system will be sent electronically to all registered participants on June 28, 2011.

Dated: New York, New York
June 28, 2011

/s/Scott M. Riemer
Scott M. Riemer
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